

1 The Honorable Robert S. Lasnik  
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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT SEATTLE

13 ALVIN GREENBERG, MICHAEL  
14 STEINBERG, JULIE HANSON, CHRISTINA  
15 KING, and RONNELL ROBERTSON, on behalf  
16 of themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-CV-00898-RSL

**JOINT STATUS REPORT AND  
STIPULATED MOTION**

NOTE ON MOTION CALENDAR:  
February 10, 2025

17 1. On October 4, 2024, the Court entered an Order Setting Trial Date and Related  
18 Dates. Dkt. 69. In that Order, the Court set a November 4, 2024 deadline for the parties to agree on  
19 custodians, search terms, and structured data, or to submit to the Court outstanding disputes on these  
20 issues. *Id.* at 1.

21 2. On December 4, 2024, Amazon filed a Motion for Protective Order regarding the  
22 range of products to be covered by its structured data productions. Dkt. 78. That motion was noted  
23 for December 18, 2024 and is fully briefed. *See* Dkt Nos. 83 (Response) and 85 (Reply).

24 3. Through stipulations previously so-ordered by the Court (Dkt. Nos. 84 & 90), the  
25 Parties agreed to extend the deadlines for negotiating custodians and search terms until January 24,  
26 2025. The Parties also agreed to extend the deadline for negotiating structured data until February  
27 10, 2025.

4. The Parties reached agreement on custodians and search terms by the January 24, 2025 deadline, subject to appropriate reservations of rights.

5. The Parties have also made substantial progress negotiating parameters for Amazon's structured data productions, significantly narrowing areas of dispute. Negotiations are ongoing and concern multiple datasets potentially bearing on the claims and defenses in this action. Given the complexities involved, the Parties believe that additional time to fully negotiate data parameters is warranted and will help minimize, if not eliminate, disputes requiring judicial involvement.

6. The Parties accordingly jointly move to extend from February 10, 2025 to March 3, 2025 the deadline for agreement or presentation of disputes regarding structured data. The Parties also move to extend the deadline for production of structured data from April 11, 2025, to May 2, 2025.

7. Datasets will be produced on a rolling basis as they are ready for production.

8. The Parties are not at this time requesting any further extensions to case deadlines.

## IT IS SO STIPULATED

DATED: February 10, 2025

Respectfully submitted,

/s/ John A. Goldmark  
John A. Goldmark, WSBA #40980  
MaryAnn T. Almeida, WSBA #49086  
Nick Valera, WSBA # 54220  
Caitlyn G. Cowan, WSBA #62344  
DAVIS WRIGHT TREMAINE LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Telephone: (206) 622-3150  
Email: [johngoldmark@dwt.com](mailto:johngoldmark@dwt.com)  
[maryannalmeida@dwt.com](mailto:maryannalmeida@dwt.com)  
[nickvalera@dwt.com](mailto:nickvalera@dwt.com)  
[caitlyncowan@dwt.com](mailto:caitlyncowan@dwt.com)

1 John Freed, *admitted pro hac vice*  
 2 DAVIS WRIGHT TREMAINE LLP  
 3 50 California Street, 23rd Floor  
 4 San Francisco, CA 94111  
 5 Telephone: (415) 276-6500  
 6 Email: jakefreed@dwt.com

7 Ryan Shores, *admitted pro hac vice*  
 8 Nowell D. Bamberger, *admitted pro hac vice*  
 9 CLEARY GOTTLIEB STEEN & HAMILTON LLP  
 10 2112 Pennsylvania Avenue, NW  
 11 Washington, DC 20037  
 12 Telephone: (202) 974-1500  
 13 Email: rshores@cgsh.com  
 14 nbamberger@cgsh.com

15 Jennifer Kennedy Park, *admitted pro hac vice*  
 16 Matthew Yelovich, *admitted pro hac vice*  
 17 CLEARY GOTTLIEB STEEN & HAMILTON LLP  
 18 1841 Page Mill Road  
 19 Palo Alto, CA 94304  
 20 Telephone: (650) 815-4100  
 21 Email: jkpark@cgsh.com  
 22 myelovich@cgsh.com

23 Charity E. Lee, *admitted pro hac vice*  
 24 CLEARY GOTTLIEB STEEN & HAMILTON LLP  
 25 One Liberty Plaza  
 26 New York, New York 10006  
 27 Telephone: (212) 225-2000  
 28 Email: charitylee@cgsh.com

29 *Attorneys for Defendant Amazon.com, Inc.*

30  
 31 DATED: February 10, 2025

32  
 33 Respectfully submitted,

34 /s/ Steve W. Berman  
 35 Steve W. Berman (SBN 12536)  
 36 HAGENS BERMAN SOBOL SHAPIRO LLP  
 37 1301 Second Avenue, Suite 2000  
 38 Seattle, WA 98101  
 39 Telephone: (206) 623-7292  
 40 Facsimile: (206) 623-0594  
 41 Email: steve@hbsslaw.com

1 Ben Harrington (*pro hac vice*)  
2 Benjamin J. Siegel (*pro hac vice*)  
3 HAGENS BERMAN SOBOL SHAPIRO LLP  
4 715 Hearst Avenue, Suite 300  
5 Berkeley, CA 94710  
6 Telephone: (510) 725-3000  
7 Facsimile: (510) 725-3001  
8 Email: [benh@hbsslaw.com](mailto:benh@hbsslaw.com)  
9 [bens@hbsslaw.com](mailto:bens@hbsslaw.com)

10 *Attorneys for Plaintiffs and the Proposed Class*

## [PROPOSED] ORDER

The Court GRANTS the Parties' stipulated motion. The deadline for the Parties to agree on custodians, search terms, and structured data, or to present disputes on those issues, is extended to March 3, 2025. The deadline for production of structured data is extended to May 2, 2025.

SO ORDERED this \_\_\_\_ day of February, 2025.

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Robert S. Lasnik  
United States District Judge